

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN, Inc., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that, pursuant to sections 342 and 1109(b) of title 11 of the United States Code (as amended and applicable to the above-captioned bankruptcy cases, the “Bankruptcy Code”), 11 U.S.C. § 101-1532, Rules 2002, 3017, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2002-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, the undersigned attorneys from Benesch, Friedlander, Coplan & Aronoff LLP hereby appear as co-counsel to the JOANN Liquidating Trust (the “GUC Trust”), acting by and through Steven Balasiano, solely in his capacity as the liquidating trustee (the “GUC Trustee”), in the above-captioned bankruptcy cases (the “Bankruptcy Cases”).

PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Rules 2002, 3017, and 9007, the undersigned requests that copies of all notices, pleadings, and all other papers required to be served in the Bankruptcy Cases be served upon the following persons, and that such persons be added to the mailing matrix in the Bankruptcy Cases:

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<sup>1</sup> The Wind-Down Debtors in these chapter 11 cases are: JOANN Inc.; Needle Holdings LLC; Jo-Ann Stores, LLC; Creative Tech Solutions LLC; Creativebug, LLC; WeaveUp, Inc.; JAS Aviation, LLC; joann.com, LLC; JOANN Ditto Holdings Inc.; Dittopatterns LLC; JOANN Holdings 1, LLC; JOANN Holdings 2, LLC; and Jo-Ann Stores Support Center, Inc.

Jennifer R. Hoover, Esq.  
Steven L. Walsh, Esq.  
BENESCH, FRIEDLANDER,  
COPLAN & ARONOFF LLP  
1313 North Market Street, Suite 1201  
Wilmington, Delaware 19801  
(302) 442-7010  
jhoover@beneschlaw.com  
swalsh@beneschlaw.com

PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Code sections 342 and 1109(b), the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules set forth above, but also includes, without limitation, any orders and notices of any application, complaint, demand, motion, petition, pleading, disclosure statement or plan of reorganization, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, overnight, or hand delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the Bankruptcy Cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent appearance, pleading, filing, claim, or suit is not intended nor shall be deemed to waive any rights of the GUC Trust, including the right to: (1) have an Article III judge adjudicate in the first instance any case, proceeding, matter, or controversy as to which a bankruptcy judge may not enter a final order or judgment consistent with Article III of the United States Constitution; (2) have final orders in a non-core case, proceeding, matter, or controversy entered only after an opportunity to object to proposed findings of fact and conclusions of law and a *de novo* review by a district court judge; (3) trial by jury in any case, proceeding, matter, or controversy so triable; (4) have the reference withdrawn by the United States District Court in any case, proceeding, matter, or controversy subject to mandatory or discretionary withdrawal; (5) maintain any objection to the jurisdiction and/or venue of the Bankruptcy Court or any other court for any purpose; or (6) assert any other rights, claims, actions, defenses, setoffs, or recoupments to which the GUC Trust is or may be

entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: October 27, 2025  
Wilmington, Delaware

**BENESCH, FRIEDLANDER,  
COPLAN & ARONOFF LLP**

/s/ Steven L. Walsh  
Jennifer R. Hoover (DE #5111)  
Steven L. Walsh (DE #6499)  
1313 North Market Street, Suite 1201  
Wilmington, DE 19801  
Telephone: (302) 442-7010  
E-mail: jhoover@beneschlaw.com  
swalsh@beneschlaw.com

*Co-Counsel to the JOANN Liquidating Trust*

**CERTIFICATE OF SERVICE**

I, Steven L. Walsh, hereby certify that on October 27, 2025, a true and correct copy of the foregoing *Notice of Appearance and Request for Service of Papers* was served upon all parties of record via CM/ECF.

/s/ Steven L. Walsh  
Steven L. Walsh (DE #6499)